

JEFFREY COVINGTON
COVINGTON vs CSAA

February 21, 2020

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1 IN THE DISTRICT COURT OF OKLAHOMA COUNTY
2 STATE OF OKLAHOMA

3 TAMMY COVINGTON and)
4 JEFFREY COVINGTON,)
5 Plaintiffs)
6 v.) Case No. 19-cv-00718-PRW
7 CSAA FIRE AND CASUALTY)
8 INSURANCE d/b/a AAA FIRE)
9 AND CASUALTY INSURANCE)
10 COMPANY, INC.)
11 Defendants)

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13 DEPOSITION OF JEFFREY COVINGTON
14 TAKEN ON BEHALF OF THE DEFENDANT
15 IN OKLAHOMA CITY, OKLAHOMA
16 ON FEBRUARY 21, 2020

17 9:04 a.m.

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20 REPORTED BY: WENDY SMITH, CSR
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1 the HVAC unit or water that you could see in the cracks
2 off of the flooring that surrounded the wall of the HVAC
3 closet?

4 A. No.

5 Q. So really, according to you, it was a onetime
6 event where you saw this water on the floor, correct?

7 A. Yes.

8 Q. How often do you change the filters on the HVAC
9 unit?

10 A. Every three months.

11 Q. Okay. So do you remember prior to August 8,
12 2017, when you had last replaced the air filters?

13 A. I don't recall.

14 Q. Okay. Do you remember the first time you
15 replaced the air filters after August 8th, 2017?

16 A. Are you asking me if there was water on the
17 floor? I mean, I know I changed the filters.

18 Q. Right.

19 A. But I did not notice water either time. I know
20 I would have done it, and I look at the floor. I look
21 at the condition of the floor. I want to make sure
22 there's nothing weird going on, any mold or whatever,
23 you know, not that I expect it to be, but I just want to
24 make sure that area's clean because we're breathing
25 that, and it's very -- should be the cleanest place in